

Order Instituting Rulemaking to Identify Disadvantaged Communities in the San Joaquin Valley and Analyze Economically Feasible Options to Increase Access to Affordable Energy in Those Disadvantaged Communities.

Rulemaking No. 15-03-010 (Filed March 26, 2015)

# MOTION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 G) FOR PERMISSION TO FILE UNDER SEAL CONFIDENTIAL MATERIAL ATTACHED TO PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 G) REPLY COMMENTS TO RESPONSES TO ADMINISTRATIVE LAW JUDGES' QUESTIONS

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Attorneys for:

Dated October 1, 2018 PACIFIC GAS AND ELECTRIC COMPANY

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Pursuant to Rules 11.1 and 11.4 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, Pacific Gas and Electric Company ("PG&E") files this motion for leave to file confidential information under seal ("Motion"). The material PG&E seeks to protect is in the confidential documents prepared in the ordinary course of its business that contain confidential customer information, consisting of customers' name and address. A redacted copy of the information is attached to "Pacific Gas and Electric Company's (U 39 G) Reply Comments to Responses to Administrative Law Judges' Questions," that is being filed concurrently with this Motion. The Declaration of Marlene Murphy-Roach identifies the confidential information and accompanies this Motion.

Public Utilities Code Section 583 provides that, "[n]o information furnished to the commission by a public utility. . . except those matters specifically required to be open to public inspection by this part, shall be open to public inspection or made public except on order of the commission, or by the commission or commissioner in the course of a hearing or proceeding." Decision 16-08-024 established a process for the submission of confidential documents to the Commission, and the process specifically referred to protection of certain customer information: "If only certain information in a document (e.g. *customer names and addresses*, contract payment amounts, etc.) is confidential, only that information rather than the

entire document should be designated as confidential."<sup>1</sup>/ As the Commission-approved form declaration indicates, several bases exist to protect as confidential customer information.<sup>2</sup>/

In this case, PG&E received communications from customers relating to the provision of gas service. These communications or other documents in some cases include the name and address of the customer. The confidential customer information is not already public, and the information cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure. Ms. Murphy-Roach, in her declaration, represents that the importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information.

For the reasons described above, PG&E requests that the Commission grant this request to file under seal the confidential, unreducted version of material contain private customer information. As required by Rule 11.4(a), a Proposed Ruling is attached to this Motion.

Respectfully Submitted,

By: /s/ Darren P. Roach
DARREN P. ROACH

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Dated: October 1, 2018 Attorney for PACIFIC GAS AND ELECTRIC COMPANY

Decision Updating Commission Processes Relating to Potentially Confidential Documents," R.14-11-001, D. 16-08-024, pp. 17-18, 31 (Ordering Paragraph No. 1) (italics added).

The form declaration identifies following bases for keeping customer information confidential: Public Utilities Code Section 8380; California Civil Code Sections 1798 et seq.; California Government Code Section 6254; D. 14-05-016, D. 04-08-055, D. 06-12-029.

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In accordance with its Rules of Practice and Procedure, the California Public Utilities Commission ("Commission") has considered the motion of Pacific Gas and Electric Company ("PG&E"), filed October 1, 2018, for leave to file confidential materials under seal ("Motion"), documents prepared in the ordinary course of its business that contain confidential customer information, consisting of the customer' name and address.

The Commission rules as follows:

1. PG&E's Motion is granted. The confidential materials in the confidential, unredacted version of the information is attached to "Pacific Gas and Electric Company's (U 39 G) Reply Comments to Responses to Administrative Law Judges' Questions," that is being filed concurrently with this Motion, and is described in the Declaration of Marlene Murphy-Roach, also attached to the Motion.

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2.	The confidential, unredacted version of this infor	mation shall remain under seal, and shall
	not be made accessible or disclosed to anyone other	er than the Commission staff except on the
	further order or ruling of the Commission, the	Assigned Commissioner, the Assigned
	Administrative Law Judge ("ALJ"), or the ALJ th	en designated as Law and Motion Judge.
Dated:	at San Francisco, California.	Administrative Law Judge

#### **ATTACHMENT A**

# DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION ON BEHALF OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

1. I, Marlene Murphy-Roach, am the Director of Income Qualified Programs and Disadvantaged Communities of Pacific Gas and Electric Company ("PG&E"), a California corporation.

AARON JOHNSON, the Vice President, Customer Energy Solutions of PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company 77 Beale Street, Mail Code N3E San Francisco, CA 94105

- 2. PG&E will produce the information identified in paragraph 3 of this Declaration to the California Public Utilities Commission ("CPUC") or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.
  Name or Docket No. of CPUC Proceeding (if applicable):
  Proceeding Number R.15-03-010.
  - 3. Title and description of document(s):

Pacific Gas and Electric Company (PG&E) Reply Comments to the responses to Administrative Law Judges' questions, pursuant to Administrative Law Judges' Ruling Requesting Parties' Response to Ruling Questions, Providing Guidance on Pilot Project Updates, Updating Proceeding Schedule, Entering Documents Into the Record, and Providing Additional Guidance to Specific Parties, Attachment 1, issued August 3, 2018.

4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart.

Check	Basis for Confidential Treatment	Where Confidential Information is located on the documents
v	Customer-specific data, which may include demand, loads, names, addresses, and billing data	Planning documents contain customer names
X	(Protected under PUC § 8380; Civ. Code §§ 1798 et seq.; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)	and addresses.
	Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver's license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual	N/A
	(Protected under Civ. Code §§ 1798 et seq.; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)	
	Physical facility, cyber-security sensitive, or critical energy infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113	N/A
	(Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)	
	Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data	
	(Protected under Civ. Code §§3426 <i>et seq.</i> ; Govt. Code §§ 6254, <i>et seq.</i> , e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)	N/A
	Corporate financial records	
	(Protected under Govt. Code §§ 6254(k), 6254.15)	

Third-Party information subject to non-disclosure or confidentiality agreements or obligations	N/A
(Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036)	
Other categories where disclosure would be against the public interest (Govt. Code § 6255(a))	
	N/A

- 5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
- 6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
- 7. Executed on this 1st day of October 2018 at San Francisco, California.

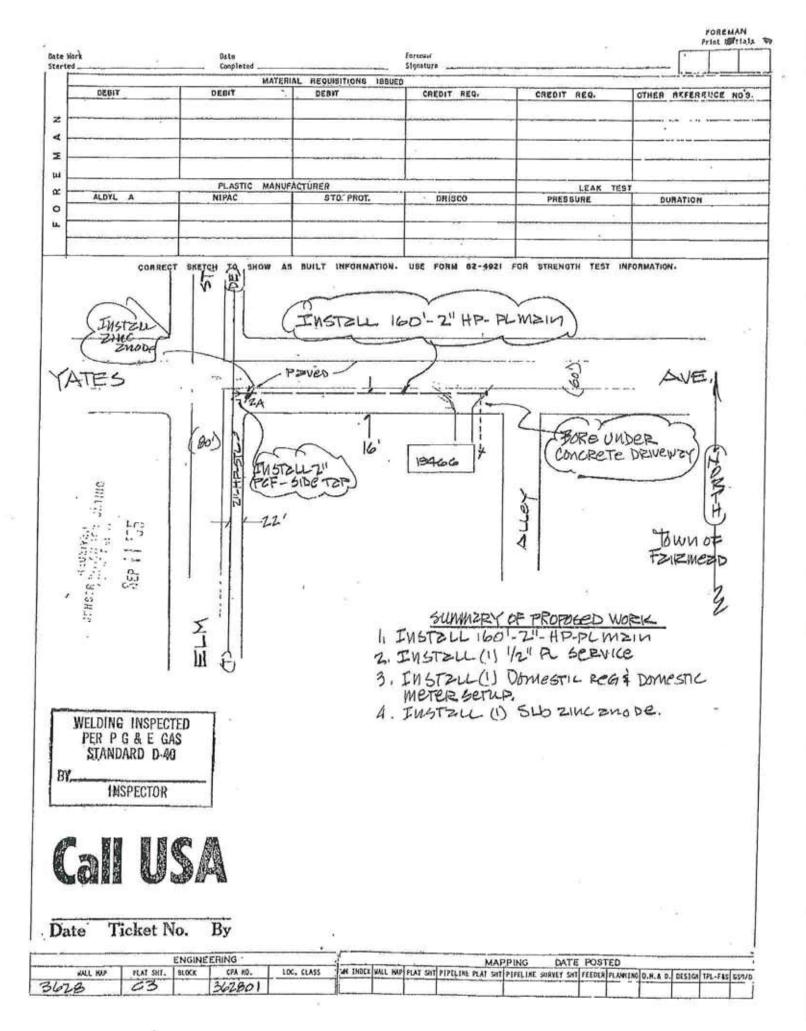
/s/ Marlene Murphy-Roach
Marlene Murphy-Roach
Director
Pacific Gas and Electric Company

#### **ATTACHMENT B**

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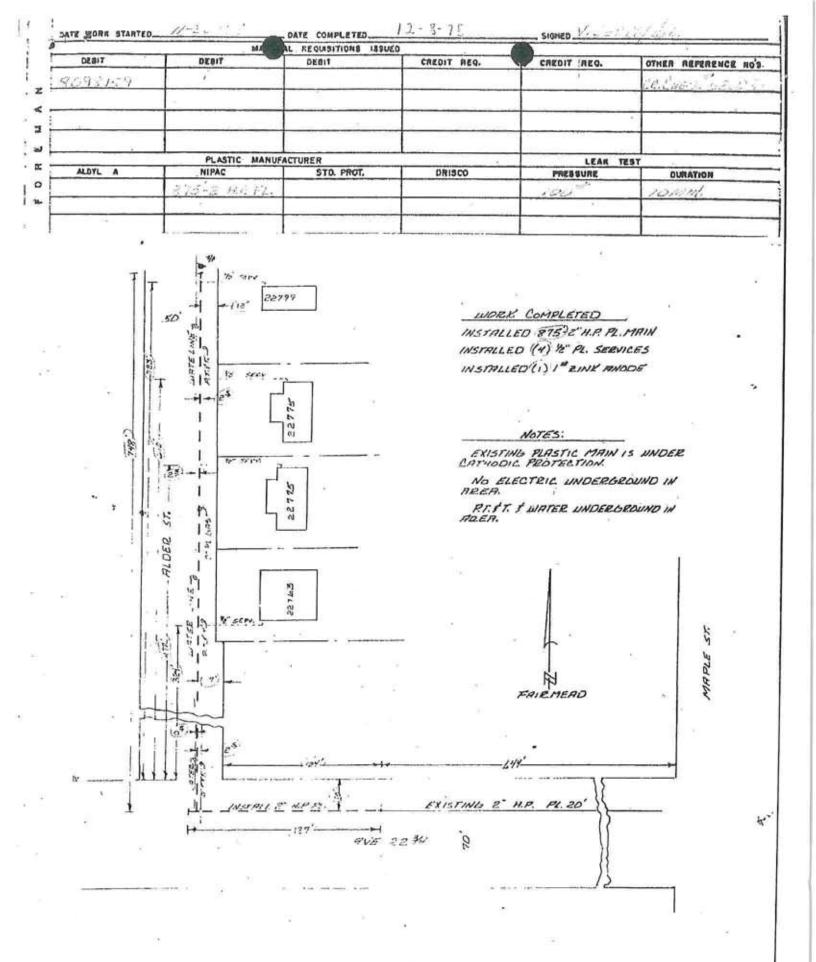
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